

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,  
vs.

Criminal No. 25-173 (PAD)

JONATHAN JOSUE ACEVEDO-CRUZ,

Defendant.

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MOTION FOR PRESERVATION OF EVIDENCE

NOW COMES Defendant, Jonathan Acevedo-Cruz, through the Federal Public Defender Office, District of Puerto Rico, and files this motion in support of his request for the entry of an order directing the United States to take immediate and affirmative steps to preserve and secure possession of any audio/video recordings made by law enforcement during their case investigation and arrest of Defendant.

The preservation of these recordings is necessary for the defense to conduct their own investigation surrounding the circumstances under which Defendant was arrested by law enforcement. For Defendant to be afforded the effective assistance of counsel as guaranteed by the Sixth Amendment, under Rule 16 (a)(1)(A)(B) and (E) of the Federal Rules of Criminal Procedure and *Brady v. Maryland*, 373 U.S. 83 (1963), Defendant moves for the entry of an order directing the government to immediately act to obtain and preserve any such recordings if they exist.

WHEREFORE, Defendant respectfully requests this Honorable Court to enter an order granting the relief requested above.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing *Motion to Preserve Evidence* with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, 25th day of April 2025.

RACHEL BRILL  
Chief Federal Defender  
District of Puerto Rico

/s/ Joseph A. Niskar  
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